

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff
RECEIVED

OCT 14 2005

-VS-

Leonard Green
Clerk

WALTER MEAD PUGH, JR.,
Defendant.

File AND Return
Case No. CK-1-02-054

HONORABLE SUSAN J. PLOT
JUDGE
03-3241
MOTION FOR EXPERT
WITNESS FEES
FILED
TAMES BONINI
CLERK
OCT 18 PM 3:43

Now comes Defendant, WALTER M. PUGH, JR.
here by moves this Court for an expert witness
fee paid for by the government for an expert in
identification for the reasons set forth below.

Respectfully,

Walter Pugh, Jr. Pres
Boone County Jail
2950 Washington St.
Burlington, KY 41005

MEMORANDUM Attach and made apart
here of.

MEMORANDUM

Dedendant was arrested for bank robbery. There was no line up nor show up. Therefore, the only identification is through poor quality photos and the identification abilities of the bank tellers.

It is common knowledge that eyewitness testimony is unreliable. This needs to be explained to the jury at trial. There are experts in this field who are available for a fee.

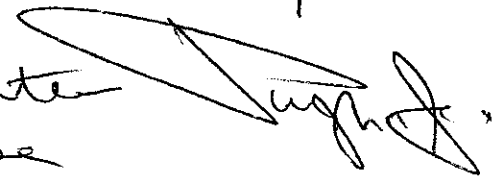
Defendant is indigent. the government should therefore pay the fee for this expert witness. ~~the~~

CONCLUSION

For the reason set forth above, the Court should order the government to pay for this expert witness.

Respectfully,

Walter
Prose



Certificate of Service

I hereby certify that a copy of the foregoing was served upon AMUL Thapar Assistant U.S. Attorney, 221 East Forth Street, Suite 400, Cincinnati, Ohio 45202, and Attorneys, JAY CLARK, 114 E. 8th St. Suite 400, Cincinnati, Ohio 45202, and William Gallagher, 114 E. 8th St., Cincinnati, Ohio 45202, by ordinary U.S. mail on this 11th day of October, 2005.

Walter
Prose

